

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
SPRINT NEXTEL CORPORATION)	WT Docket 11-110
)	
Petition for Declaratory Ruling or, in the)	
Alternative, Petition for Petition for Rulemaking)	

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in the above-captioned proceeding in response to the Commission’s *Public Notice*, DA 11-1152, released June 30, 2011, seeking comments on a Petition submitted by Sprint Nextel Corporation (“Sprint Nextel”) regarding wideband operations in the 800 MHz band.¹

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified frequency coordinator for Part 90, Public Safety Pool channels, and appears regularly before the Commission on a wide range of public safety communications issues. APCO has been at the forefront of the long-standing issues related to rebanding of the 800 MHz band made necessary by interference from Sprint Nextel operations.²

¹ Request for Declaratory Ruling that the Commission's Rules Authorize Greater than 25 kHz Bandwidth Operations in the 817-824/862-869 MHz Band, submitted to the Chief, Mobility Division, Wireless Telecommunication Division, FCC, on filed June 3, 2011.

² See WT Docket 02-55.

Sprint Nextel is seeking authority through either a declaratory ruling or rulemaking to deploy wideband technology options, such as 1.25 MHz CDMA equipment, in the 800 MHz Enhanced Specialized Mobile Radio Service (“ESMR”) bands (817-824/862-869 MHz). As the Commission is well aware, the 800 MHz band is currently in the process of a comprehensive “rebanding” to shift public safety licensees to the lower end of the band to create channel separation with Sprint Nextel’s ESMR operations. Once rebanding is completed, APCO would not object to CDMA deployment in the ESMR band as there would be little or no potential for interference. In the meantime, however, APCO is concerned that the introduction of new technologies in a band undergoing major transition could lead to harmful interference.

APCO recommends, therefore, that Sprint Nextel be prohibited from deploying wideband operations in any region³ in which rebanding is not complete. Furthermore, to protect adjacent regions, Sprint Nextel should maintain a minimum of 1.0 MHz separation from any public safety operation in the upper portion of the interleaved band (*i.e.*, above 860 MHz) in the service area of the Sprint Nextel cellular site. For Sprint Nextel operations in a rebanded region that are near the edge of an incumbent public safety system in a non-rebanded region, the incumbent public safety operations must be protected both on-channel and on the 12.5 kHz offsets to the 5 dBu contour to protect public safety mobile and handheld operations.

³ In this context, “region” refers to the 55 National Public Safety Planning Committee (“NPSPC”) regions.

CONCLUSION

APCO urges the Commission not to authorize wideband operation in the 800 MHz band without appropriate protections against interference to public safety operations.

Respectfully submitted,

/s/

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